

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

<b>UNITED STATES OF AMERICA</b>  <b>v.</b>  <b>CHARLES AUSTIN JENKINS</b>  <b>Defendants</b>	<b>Criminal No. 23-cr-00123-SAG</b>
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**DEFENDANT CHARLES JENKINS' MOTION TO EXCLUDE TIME**  
**UNDER THE SPEEDY TRIAL ACT**

The defendant, Charles Austin Jenkins, through undersigned counsel, moves that this Court make a finding pursuant to 18 U.S.C. § 3161(h)(1) and (7)(A) and (B) that time necessary for the review of evidence and discussions with the Government regarding this case are proceedings within the contemplation of the Speedy Trial Act and that the ends of justice served by continuing the trial date beyond the 70-day period normally required under 18 U.S.C. § 3161(c)(1) outweigh the best interests of the public and the defendant in a speedy trial. For the reasons set forth below, the Court should find that the parties need a longer period than is normally afforded under the Speedy Trial Act for review of the pertinent records, preparation of pre-trial motions and in preparation for trial in the event that no pretrial resolution is reached.

1. The Defendant was charged on April 5, 2023, with, *inter alia*, Conspiracy to Interfere with Government Functions, in violation of 18 U.S.C. §371, False Statements During Purchase of Firearms in violation of 18 U.S.C. §922(a)(6), and Unlawful Possession of a Machinegun, in violation of 18 U.S.C. §921(a)(24) & 922(o).

2. The Defendant made an initial appearance on April 12, 2023. Co-defendant Robert Krop made an initial appearance on April 13, 2023.

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3. The Government made an initial discovery production to the Defendants on April 14, 2023. The Government made a supplemental discovery production on April 28, 2023, which contained discovery obtained after the Government's initial production.

4. Counsel for defendant Jenkins has been reviewing the voluminous discovery and has been communicating with the Government regarding the case and the discovery provided to date. Additional time is need for a complete review of evidence and to allow for further discussions with the Government about the case.

5. For the foregoing reasons, defendant Jenkins requests that the period of time from April 14, 2023, through June 16, 2023, be excluded from the Speedy Trial Act's calculation pursuant to 18 U.S.C. §3161 (h)(1) and 18 U.S.C. 3161(h)(8)(A) to allow for the further production and review of discovery and for the preparation of pretrial motions and for trial preparation and to allow the parties to discuss the case further.

6. Undersigned counsel has spoken with AUSA Leo Wise and is authorized to represent to the Court that the Government does not object to this motion.

Respectfully submitted,

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/s/

Andrew C. White  
(Federal Bar No. 08821)  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on May 24, 2023, a copy of the foregoing motion was filed via ECF, which caused copies to be sent to all parties of record.

\_\_\_\_\_/s/\_\_\_\_\_  
Andrew C. White